

EXHIBIT A

Correspondence Re RFP Nos. 19 & 24



Shirley LaVarco <shirley@civilrightscorps.org>

[Response Requested] Meet & Confer Re Deficiencies in Your Document Productions

Shirley LaVarco <shirley@civilrightscorps.org>

Fri, Dec 1, 2023 at 9:36 PM

To: Kathryn Vestal <KVestal@thompsonhorton.com>

Cc: Celena Vinson <cvinson@thompsonhorton.com>, Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>, Leigh Whiting <lwhiting@thompsonhorton.com>

Dear Counsel,

During our discussion yesterday, Plaintiff's counsel indicated we would be amenable to narrowing or modifying RFP Nos. 19 and 24, or otherwise working with you to develop search terms, so that you can more easily locate records that are responsive to the same.

For ease of reference, the language of our original requests of each of the Joint Defendants are:

No. 19: All documents concerning all K9 deployments conducted by or involving you, including any such deployments where you were present, contacted, or consulted, before, during, or after a K9 injured a person.

No. 24: All documents concerning instances since February 22, 2019, in which both you and a K9 were present when a suspect was apprehended, or an arrest was made or attempted, but the K9 did not injure any person.

We are amenable to consolidating these requests into a single, modified request as follows:

All incident or supplemental reports dated February 22, 2019 to present, where the incident involved a K-9 and where your name or badge number appears in any of the documentation of that incident. This includes any reports you authored or signed off on, as well as those you are referenced in.

We believe this modified request will allow the records custodian to locate responsive records more easily.

Best,
Shirley

Shirley LaVarco | Attorney*she/her/hers**(202) 932-1270***Civil Rights Corps***1601 Connecticut Avenue NW, Suite 800**Washington, D.C. 20009****Admitted to practice in the District of Columbia.***

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